



Jackson Lewis P.C.  
200 Connell Drive, Suite 2000  
Berkeley Heights NJ 07922  
(908) 795-5200 Direct  
(908) 464-2614 Fax  
jacksonlewis.com  
Richard J. Cino – Managing Principal

AMANDA E. MILLER, ESQ.  
Email: [Amanda.Miller@jacksonlewis.com](mailto:Amanda.Miller@jacksonlewis.com)

June 4, 2021

**VIA ELECTRONIC FILING**

Hon. Cathy L. Waldor, U.S.M.J.  
U.S. District Court for the District of New Jersey  
MLK, Jr. Courthouse  
Newark, New Jersey 07101

Re: Ann Carletta v. Bertelsmann, Inc., *et al.*  
Docket No. 2:20-cv-14304 (KSH)(CLW)

Dear Judge Waldor:

This firm represents Defendants Bertelsmann, Inc. and RTL AdConnect, Inc. (“Defendants”) in the above matter. On December 31, 2020, Defendants’ served Plaintiff with Defendants’ First Request for Production of Documents, First Set of Interrogatories, as well as authorizations for the release of Plaintiff’s medical, psychotherapy, employment records, and specific employment records from Time Warner Cable Media/Spectrum Reach.

On February 2, 4, and 8, 2021, Defendants sent Plaintiff correspondence inquiring as to the status of Plaintiff’s discovery responses. On February 8, 2021, Plaintiff advised the executed authorizations were forthcoming. On February 15, 2021, and March 2, 2021, Defendants again inquired as the status of Plaintiff’s discovery responses, to which Plaintiff failed to respond. On March 12, 2021, Defendants again sent correspondence detailing Plaintiff’s deficiency and requesting Plaintiff to execute the above-referenced authorizations by March 22, 2021.

On April 14, 2021, Your Honor held a status conference, wherein Plaintiff requested an additional thirty (30) days to respond to Defendants’ discovery. On May 11, 2021, Defendants followed up as to the status of the discovery responses and Plaintiff advised the responses were being finalized. On June 2, 2021, Defendants again requested the status of Plaintiff’s discovery responses. To date, Plaintiff has failed to respond to Defendants’ discovery requests or provided

**JacksonLewis**

Hon. Cathy L. Waldor, U.S.M.J.  
U.S. District Court for the District of New Jersey  
June 4, 2021  
Page 2

executed authorizations. Plaintiff's failure to respond has stalled discovery in this matter.

Defendants cannot defend this matter or proceed with depositions without the benefit of rudimentary paper discovery which has been unilaterally denied by Plaintiff at this time. The Court should not permit this to continue unabated. As such, Defendants respectfully request the Court enter an Order, requiring Plaintiff to provide discovery responses by June 14, 2021, and further, permit Defendants to file a motion to dismiss if Plaintiff fails to respond.

We thank Your Honor for your consideration.

Respectfully submitted,

JACKSON LEWIS P.C.

s/ Amanda E. Miller

Amanda E. Miller

AEM:am

cc: Leonard E. Seaman, Esq. via ECF)